IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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Chapter 11

HOSPITALITY INVESTORS TRUST, INC., et al., 1

Case No. 21-10831 (CTG)

Debtors.

(Jointly Administered)

Re: Docket Nos. 7, 8, 50 & 109

NOTICE OF FILING OF PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (A) APPROVING PREPETITION SOLICITATION PROCEDURES, (B) APPROVING ADEQUACY OF DISCLOSURE STATEMENT, AND (C) CONFIRMING JOINT PREPACKAGED CHAPTER 11 PLAN FOR HOSPITALITY INVESTORS TRUST, INC., AND HOSPITALITY INVESTORS TRUST OPERATING PARTNERSHIP, L.P.

PLEASE TAKE NOTICE that, on May 19, 2021, the above-captioned debtors and debtors in possession (the "Debtors"), filed the Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P. [Docket No. 7] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified, and/or supplemented the "Plan") and the Disclosure Statement for Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P. [Docket No. 8] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified and/or supplemented from time to time, the "Disclosure Statement") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, on June 14, 2021, the Debtors filed the *Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust*

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Hospitality Investors Trust, Inc. (3668); and Hospitality Investors Trust Operating Partnership, L.P. (0136). The Debtors' executive offices are located at Park Avenue Tower, 65 East 55th Street, Suite 801, New York, NY 10022.

Operating Partnership, L.P. (Conformed Version) [Docket No. 109] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified, and/or supplemented the "Conformed Plan").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order (I) Scheduling and Shortening Notice of, Combined Hearing On Adequacy of Disclosure Statement and Confirmation of Prepackaged Plan; (II) Approving Procedures for Objecting to Disclosure Statement and Prepackaged Plan; (III) Approving Prepetition Solicitation Procedures, Form of Ballot, and Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline; (IV) Approving Notice and Objection Procedures for the Assumption of the Executory Contracts and Unexpired Leases; (V) Conditionally (A) Authorizing the United States Trustee to Not Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing Schedules and Statements, List of Equity Security Holders, and Rule 2015.3 Reports; and (VI) Granting Related Relief [Docket No. 50], a hearing has been scheduled before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, in the Court, located at 824 N. Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801 on June 23, 2021 at 11:00 a.m. (ET) to consider confirmation of the Conformed Plan (the "Combined Hearing").

PLEASE TAKE FURTHER NOTICE that attached hereto as <u>Exhibit A</u> is the *Proposed Findings of Fact, Conclusions of Law, and Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackages Chapter 11 Plan for Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P.* (the "<u>Proposed Confirmation Order</u>"). The Debtors reserve the right to materially, alter, amend, or modify the Proposed Confirmation Order. The Debtors intend to present the Proposed Confirmation Order to the Court at the Combined Hearing.

Dated: June 14, 2021

Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ R. Stephen McNeill

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Attorneys for Debtors and Debtors in Possession